

Board of Directors

**Good Faith Reporting and Chain of Command Policy
No. 1200**

PURPOSE

To encourage good faith reporting of safety, quality, ethical, and compliance concerns and provide guidance regarding the chain of command.

SCOPE

All Consortium workforce members, affiliates and others reporting concerns

POLICY

1. All workforce members and affiliates are expected to promptly report safety, quality, ethical and compliance concerns, including potential violations of laws, regulations, policies and the Code of Conduct.
2. ANTHC encourages individuals to follow established reporting channels and to use their chain of command to report concerns about safety, quality, ethics or compliance. However, individuals are permitted, and expected, to skip steps or use other reporting options when
 - 2.1 they are concerned that the designated channel or their supervisor may not understand the concern or appreciate its urgency;
 - 2.2 they believe that the designated channel or their supervisor cannot follow-up quickly enough to avoid harm;
 - 2.3 the concern is about their supervisor or someone ordinarily involved in the designated channel; or
 - 2.4 they fear retaliation or reprisal or have other concerns that might discourage reporting to their supervisor or through ordinary channels.
3. Retaliation or other reprisal against workforce members and affiliates for making good faith reports is strictly prohibited and may result in discipline or other sanctions.
 - 3.1 A good faith report is based on an honest, sincere concern. Individuals who make good faith reports are protected, even if later review determines that the concern was not substantiated.

Effective: September 1, 2015

Approved: June 3, 2015

- 3.2 Reporting concerns under this policy will not automatically insulate the reporter from corrective action if the action is otherwise appropriate.
- 3.3 Individuals who believe they may be experiencing retaliation or other reprisals for making a good faith report should notify ethics and compliance or human resource staff immediately.

GOOD FAITH REPORTING AND CHAIN OF COMMAND POLICY	
Authority to Approve	Board of Directors
Approval Date	June 3, 2015
Effective Date	90 days after approval; September 1, 2015
Supersedes	Good Faith Reporting and Non-Retaliation, #1200; Good Faith Reporting and Non-Retaliation, ANTHC Policy No. HR-708
Due for Review	June 3, 2018
Responsible for Review	Chief Ethics and Compliance Officer
Related Policies, Procedures, Etc.	Compliance Awareness and Reporting Policy No. 01-3007
References and Historical Notes	
Search Terms	Retaliation, reprisal, whistleblower, good faith, bad faith, safety, compliance, ethics, ethical, legal, regulatory, OSHA, OIG, DOL, CMS, Joint Commission, TJC, ARRA, FCPA,

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